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11 **UNITED STATES DISTRICT COURT**  
12 **CLARK COUNTY, NEVADA**

13 NANCY FLETCHER, an individual,  
14  
15 Plaintiff,  
16  
17 v.

18 COSTCO WHOLESALE CORPORATION  
19 and; DOES 1 through 100; and ROE  
20 CORPORATION 101 through 200,  
21 inclusive,  
22 Defendant(s).

**Case No.: 2:20-CV-01202-RFB-EJY**

**STIPULATION AND ~~PROPOSED~~**  
**ORDER FOR EXTENSION OF**  
**DISCOVERY DEADLINES**  
**[SECOND REQUEST]**

23 Plaintiff, Nancy Fletcher, by and through her counsel of record, the law firm of  
24 **Bernstein & Poisson** and Defendant, Costco Wholesale Corporation, by and through its  
25 attorneys of record **Olson, Cannon, Gormley, & Stoberksi**, hereby stipulate and request  
26 to extend the respective Discovery Deadlines in this case as follows:

27 **I. DISCOVERY COMPELTED TO DATE**

28 All parties have served disclosures of documents and witnesses. Parties have  
served interrogatories, requests for production of documents, and request for  
admissions and Parties have responded to interrogatories, requests for production

1 of documents, and request for admissions. The deposition of Plaintiff has been  
2 completed.

3 **II. DISCOVERY REMAINING**

- 4 1. Deposition of Defendant or 30(b)(6)  
5 2. Initial Expert Disclosures  
6 3. Rebuttal Expert Disclosures  
7 4. Depositions of treating physicians and experts to be disclosed.  
8 5. Additional Written Discovery

9 **III. THE REASONS WHY THE DISCOVERY REMAINING CANNOT BE**  
10 **COMPLETED WITHIN THE TIME LIMITS SET BY THE DISCOVERY**  
11 **ORDER**

12 The parties have diligently been obtaining the necessary discovery in this matter,  
13 however, due to the COVID-19 restrictions and delays, availability for experts is limited  
14 and the ability to retain experts has been limited. Accordingly, the parties request a 90-day  
15 extension of the discovery deadlines. The parties are hopeful they may be able to resolve  
16 this matter in that time prior to expending the costly expense of experts.  
17

18 **IV. CURRENT DEADLINES**

- 19 1. June 18, 2021– close of discovery.  
20 2. Closed – final date to amend pleadings and add parties.  
21 3. April 21, 2021 – final date to make expert disclosures.  
22 4. May 20, 2021 – final date to make rebuttal expert disclosures.  
23 5. July 20, 2021– final date to file dispositive motions.  
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25  
26  
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**V. Proposed Schedule For Completing All Remaining Discovery**

1. September 16, 2021– close of discovery.
2. Closed – final date to amend pleadings and add parties.
3. July 20, 2021 – final date to make expert disclosures.
4. August 18, 2021 – final date to make rebuttal expert disclosures.
5. October 18, 2021– final date to file dispositive motions.

**BERNSTEIN & POISSON**

**OLSON, CANNON, GORMLEY, &  
STOBERSKI**

**DATED: APRIL 14, 2021**

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/s/Amber N. King .  
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**IT IS SO ORDERED:**

  
**UNITED STATES MAGISTRATE JUDGE**

**DATED: April 14, 2021**